

IV.E. Narrative/Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area

Originally settled in 1770, Lewiston, Maine was incorporated as a city in 1795. Lewiston is Maine's second largest City with a population of 36,211. The target area for this proposal is Census Tracts 201-204, the downtown neighborhoods surrounding Bates Weave Shed (Mill #5), the project site, which is located in Census Tract 201. Approximately 1,500 people live in the dense neighborhood around the building. Over 13,000 people live within walking distance of the mill complex.¹ Since 2001, many immigrants, refugees and asylum seekers have moved to Lewiston, often choosing to live in the target area because of the low cost large tenement style housing units. The most recent Lewiston Comprehensive Plan estimated the immigrant, refugee, and asylum seeker population to be 6,000, most of whom live in the target area.

During the mid-19th century, the downtown gave rise to textile mill development benefiting from hydropower and a newly constructed canal system. At its peak, ten mills operated within a quarter square mile area. Bates Weave Shed (Mill #5) was the largest building in the Bates Mill industrial complex. Operations included weaving, bleaching and dyeing of cloth; fabrication, machining and maintenance of equipment; generation and distribution of electricity for operations; and warehousing/distribution. The downtown target area was developed with dense tenement style apartment buildings within walking distance of the mills. Bates Manufacturing, with 5,000 employees, was the largest private employer in Maine during the 1950's. When the last Bates bedspread was woven in Bates Weave Shed (Mill #5) in 2000, fewer than 100 people worked in a small area of the building. As the textile industry in Maine declined, Lewiston's economy suffered. Mills were left vacant, underutilized, and deteriorating. Over 2.5 million sq.ft. of mill space remained in the downtown as brownfield sites. Surrounding neighborhoods became distressed from the loss of jobs, building deteriorations, and environmental issues. Today, approximately 33% of Lewiston's population lives in the target area. The poverty rate in these neighborhoods is 42.8%, while the Maine poverty rate is 12.9%.²

ii. Description of Brownfields Site

Bates Weave Shed (Mill #5) is located within federally designated flood plain zone AE. Zone AE presents a 1% annual chance of flooding (aka 100 year flood plain). Bates Weave Shed (Mill #5) was designed by Albert Kahn, one of the pre-eminent architects of the 20th century, specifically for Bates Manufacturing, to house the company's jacquard looms. It is among the first concrete and steel buildings constructed in Maine and was completed in 1914. The building is located near the head of the 1.5-mile hand dug canal system, which captured and redirected the power of the Great Falls of the Androscoggin River to power the industries around which Lewiston grew.

During a fire at an adjacent mill in 2009, embers landed on the saw tooth roof of Bates Weave Shed (Mill #5) and a portion of the roof caught on fire. This has left the roof with several holes,

¹ Source: U.S. Census Bureau, 2010 Census.

² Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

which has allowed water to leak into the building creating structural issues. Despite the City's recent efforts to repair, snow load during the winter months has not helped the situation and during a walkthrough of the building piles of snow and ice were observed in sections of the building. Past Phase I and II Assessments have identified improperly stored/or disposed of chemicals related to manufacturing, lubricants and greases, ACM, lead paint, and Universal Wastes. PCB levels above Maine DEP cleanup standards have been identified in a hydroelectric generating room and adjacent transformer room. A Maine Voluntary Response Action Program (VRAP) Certificate of Completion was provided to the City in 2004 for work performed within this building to remediate some of the past contamination issues identified in a Phase II ESA. Asbestos in the roof, PCBs in concrete, and lead paint remain the final issues to be addressed in this mill.

b. Revitalization of the Target Area

i. Redevelopment Strategy and Alignment with Revitalization Plans

Bates Weave Shed (Mill #5) has been the focal point of public engagement and revitalization plans for the past 20 years. The Legacy Lewiston Comprehensive Plan (LLCP) tasks the City to “support the efforts to stabilize and reuse the building or redevelopment of the site”. Additionally, the LLCP identifies several strategies for developing the City and downtown, with an emphasis on featuring all things green and healthful, promoting mixed use centers, prioritizing economic vitality, and promoting transportation choice and mobility. The redevelopment plan for Bates Weave Shed (Mill #5) will achieve these goals by, respectively: creating a publicly accessible sculpture garden; supporting retail, health organizations, and education institutions; increasing job training opportunities; and creating pedestrian thoroughways where none currently exist. The 2012 Riverfront Master Plan, recognizing the deterioration of the structure, suggests several reuses, including demolition, in order to promote development. Grow L+A, a community organization, has been engaging the public on redevelopment opportunities for Bates Weave Shed (Mill #5) since 2012 when the City was about to demolish the building. Their work presented a new plan for redevelopment and attracted a local developer, Tom Platz of Platz Associates, with whom the City has partnered on redevelopment of the Bates Mill complex since 1996. Presently, Platz has an option to purchase Bates Weave Shed (Mill #5) from the City. For the last four years, he has been working on redevelopment plans for the building. The YMCA has publicly announced their intention to lease approximately 75,000 sq.ft. in the building. An existing health institution targeted at workforce training will use over 100,000 sq. ft. of space. The remaining space will be a shopping corridor with a variety of food and retail options.

ii. Outcomes and Benefits of Revitalization Strategy

The greenest form of development is building reuse. Removing the Hazardous Substances from Bates Weave Shed (Mill #5) will allow the building to be reused rather than demolished and keep extensive amounts of debris out of our landfills. In addition to replacing the glazing on the north side of the saw tooth roof structures to provide ample natural light throughout the building and reduce electricity costs, the developer will install photovoltaic panels on the south side of the structures. The panels will create about 1 megawatt of electricity. The developer will also install energy efficient appliances and systems including heat and air systems which recover heat to reduce energy costs.

Grow L+A has been working with the developer and City to promote alternate forms of transportation around the Bates Mill Complex. These plans include the installation of bike racks by the Mill 5 entrance and adjacent parking garage, as well as working with the local bus agency to add a bus stop near Mill 5. Currently, with the size of the mills downtown and presence of the canal system, the Bates Mill campus fragments pedestrian access from the business and arts district east of the mills, from the neighborhoods, green space, and river west of the mills. To enhance walkability within the area, a public connection way is planned from the parking garage through Mill 5, over the adjacent canal, to provide a direct connection to the core business and arts district downtown.

A planned sculpture garden along an existing canal will increase and activate the available urban public greenspace.

The redevelopment of Bates Weave Shed (Mill #5) will create 250 construction jobs over the course of 14 months. Upon completion of the redevelopment, 1800 permanent jobs could be created. Many of these jobs will be in a Community-Integrated Health Center, which will be produced through the combined efforts of the YMCA and a local healthcare institution and training center. Approximately 33% of Lewiston's population lives in the target area. The poverty rate in these neighborhoods is 42.8%, while the Maine poverty rate is 12.9%.³ Most walk or rely on public transportation to access health care and work opportunities. This redevelopment will provide increased access to training programs, livable wage jobs, walkable shopping opportunities, and health care access.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

The total amount of the cleanup is \$1,032,000. The EPA grant funds will facilitate cleanup of asbestos and PCB, allowing the city to seek a revised VRAP from the MEDEP so that the project will be bankable. The City can then leverage an additional \$432,000 from the Androscoggin Valley Council of Governments Revolving Loan Fund and the City of Lewiston Community Development Block Grant or other municipal funds, which will close the gap between the amount of EPA grant funds and total cost of the project, to finish the lead paint remediation. After cleanup is completed, Platz Associates expects to invest \$60 million in the building and has already invested over \$400,000 creating redevelopment plans for the building.

ii. Use of Existing Infrastructure

In recent years the combined sewer line has been separated and slip lined. The building is well situated on roads, with nearly 30,000 cars a day driving by the north end of the building. The City will utilize the existing parking garage adjacent to Bates Weave Shed (Mill #5) and expand the garage to fit the increased demand. Fiber optic is available in the street. All existing utilities will be utilized to support redevelopment. The City of Lewiston intends to invest \$11.5 million by adding 500 parking spaces in a garage expansion and improving a public street abutting the building.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

³ Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

a. Community Need

i. The Community's Need for Funding

The median household income in Lewiston is below the state average (Source: 2015 American Community Survey). Commercial rents in Lewiston are significantly lower than the rents paid in Maine's largest city, Portland, 35 miles to the south. Construction costs are the same. Local rents will not support the development of privately owned parking, nor extraordinary site development costs. The City's per capita operating budget and assessed value is the lowest of the 10 largest communities in Maine, but the tax mil rate is among the highest in the state. Lewiston has \$536 million in tax-exempt properties which, if taxed, would increase the tax base by 25%. Since 2000, approximately 6,000 immigrants, refugees and asylum seekers have moved to Lewiston. Many rely on City General Assistance while waiting for their work application approvals, which can take several months or, in some cases, years. The General Assistance office has added several additional positions to handle the demand, further burdening the city budget. Municipal taxpayers cannot afford additional debt or higher taxes. Because of the City's high demand for municipal services, high population, pressure of tax exempt properties, assistance to encourage redevelopment that will help increase the tax base and reduce impact to tax payers is critical. Maintaining ownership of Bates Weave Shed (Mill #5) for over 20 years has put financial pressures on the City. A local developer has an option to purchase and redevelop the property. However, for the project to be economically viable it must be environmentally clean and bankable. Given these challenges, grant funding for the clean-up of Bates Weave Shed (Mill #5) is a critical resource for the project to be carried out, ultimately promoting redevelopment.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Bates Weave Shed (Mill #5) is located in the poorest and most blighted area of the City. Rents are lower in the target area and the housing stock is of poor condition with serious code violations. This area houses 33% of Lewiston's population. Nearly 43% are at or below the poverty level. Many residents of the target area are experiencing effects of generational poverty. Since 2000, approximately 6,000 immigrants, refugees and asylum seekers have moved to Lewiston. While the majority are from Somalia, current refugee populations are coming from Somalia, Sudan, Congo, Ethiopia, Burma, Iran and Iraq. (Source: <http://www.ccmaine.org/refugee-immigration-services/faqs>). Approximately 1,374 school students, or one in four, are in the English Language Learner (ELL) Program. A total of 34 languages are spoken in the ELL classes. Many have come from war torn countries or have been living in refugee camps without fresh food or water to drink. Children are often malnourished and have immature internal systems making them more susceptible to environmental health concerns. Lewiston's rate of childhood lead poisoning is more than twice the state average, mostly affecting the refugee populations living in poorly maintained buildings in the target area.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Lewiston is located in the Western Public Health District which covers Androscoggin, Oxford and Franklin Counties. The Western Maine Public Health District has the 2nd highest rate of pre-term births. The rate of childhood lead poisoning in Lewiston is 6.8%, while the state average is 2.9%. This is attributable to having a very high percentage of pre-1970 homes, compounded by

low rents resulting in poorly maintained buildings. Investment in the target area through the redevelopment of Bates Weave Shed (Mill #5) could spur investment in the housing stock, resulting in healthier living spaces. The obesity rates in the target area are above those in both Lewiston and Androscoggin County. Lewiston has the highest rate of asthma related emergency department visits and asthma related hospitalizations in Androscoggin County (Source: <https://data.mainepublichealth.gov/tracking/>). The EPA 2011 National Air Toxics Assessments for respiratory hazard index (the ratio of exposure concentration in the air to the health-based reference concentration set by EPA) ranks the neighborhood surrounding Bates Weave Shed (Mill #5) in the 89 percentile compared to the rest of the United States. Compared to Maine alone, this neighborhood is in the 99 percentile and the entire target area averages in the 95 percentile. (Source: EPA EJScreen, <https://ejscreen.epa.gov/mapper/>).

(3) Economically Impoverished/Disproportionately Impacted Populations

Bates Mill #5 is located in Census Tract 201. This is one of the poorest census tracts in Maine with almost half of residents in living below the poverty line (42.8% in the complete target area). The downtown is walkable but segregated by large mill buildings and canals. Many of the residents work at restaurant or retail jobs outside the target area, often working nights and weekends. The bus system only serves until 6 PM during the week, and does not serve at all on Sundays. There is limited child care available after day light hours. The Career Center is located approximately 6 miles from the downtown target area, making access difficult. Within the target area, there are convenience stores but little to no access grocery stores with fruits and vegetables at an affordable price. The redevelopment will create additional jobs within walking distance to the poorest neighborhoods as well as accessibility to job training in the health care fields.

b. Community Engagement

i. Community Involvement

Partner Name	Point of Contact (Name, Email, Phone)	Specific Role in the Project
Grow L+A	Gabrielle Russell, President 207-240-6403 info@growla.org	Be a liaison between the City, Platz Associates, and residents in redevelopment; recruit businesses that will increase equal access to health care, jobs, and healthy foods.
Healthy Neighborhoods	Paige Wagner, Network Organizer (207) 312-9904 pwagner@community-concepts.org	Use relationships and extensive social network to gain input from residents about cleanup efforts and future development opportunities.
Healthy Androscoggin	Katie Boss, Health Promotion Manager (207) 330-7895 bosska@cmhc.org	Disseminate information to residents about health hazards before and during cleanup through social networks

ii. Incorporating Community Input

At the start of the project, the City will develop a project web page on the City website. This page will act as a central location for project information, meeting dates, and contact person for questions of concerns. Social media and the local newspaper will also be utilized. Community organizations, including Grow L+A, Healthy Neighborhoods, and Healthy Androscoggin, will be able to access the website for information gathering as well as link to the website to increase the distribution of information. In addition to electronic media, notices and information will be published via flyers in multiple languages throughout the community and printed in the local newspaper. Contact information for the City of Lewiston Economic and Community Development Director will be provided in each notification for greater access.

During the project, a minimum of three public meetings will be conducted. Meetings will be held in an accessible location with the ability for necessary accommodations. Meetings will be recorded, televised, and available for on-demand streaming. Furthermore, City staff will work with Healthy Neighborhoods on meeting design to encourage participation from all populations. A charrette style meeting is anticipated and small group discussion may be utilized to promote dialogue. This plan may evolve based on community organization input on the design. The developer, Platz Associates, will be engaged in public meetings around the public-private partnership to redevelop the mill.

To ensure our most sensitive populations are engaged in this process and dialogue occurs, the City will partner with Healthy Neighborhoods for assistance with planning, outreach, and meetings to ensure all residents in the target area are considered. Between meetings, members of the Healthy Neighborhoods Planning Council will be informed and ready to provide education on the clean-up to their constituents as appropriate. Members of their network have established relationships with many people living and working in the targeted area. This boots on the ground approach will help expand our outreach to more marginalized residents living in the target area, including immigrant, refugee, and low-income persons, whose primary access to information is through their social network, in the appropriate language for maximum understanding. Translation services will be available if needed at all public meetings.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

A Draft Analysis of Brownfields Cleanup Alternatives was developed by an Environmental Professional on January 1, 2019 at the request of the City and submitted for public review. The proposed plan is to remove the asbestos during the rehabilitation of the roof. Non-friable asbestos will be transported to a licensed landfill for disposal. This will provide protection to human health and the environment by removing the potential for airborne asbestos from the area. The PCB impacted concrete will be encapsulated with a USEPA TSCA approved sealant and access to these areas will be restricted. Lead based paint will be pressure washed and encapsulated. The potential for future indirect exposure will be eliminated as the source materials will be permanently removed.

b. Description of Tasks and Activities

Task 1- Cooperative Agreement Oversight:

The City anticipates 30 hours of the Economic Development Director's time at \$49.56/hour and \$19.80/hour in fringe benefits and 10 hours of the Grant Accountant's time at \$26.68/hour and \$10.33/hour in fringe benefits will be used to manage the grant. The City will send its Economic Development Director to the national Brownfields Conference. It is estimated that \$2000 will cover airfare, meals, lodging, and incidentals. Through attendance at this conference the City will gain valuable knowledge and networking opportunities to market the Bates Weave Shed (Mill #5). Additionally, **a Qualified Environmental Professional (QEP) will be procured** using the USEPA's acceptable procedures. Once procured, it is expected that \$2000 will be used for QEP cooperative oversight of grant. The Community Development Coordinator will use 6 hours at \$32.56/hr and \$10.84/hr in fringe to procure the QEP.

Task 2- Community Outreach & Engagement:

The Community Development Coordinator will work with a QEP and community organizations to assist in public and community involvement, spending 5 hours at \$32.56/hr and \$10.84/hr in fringe. We anticipate at **least three public meetings** with the Economic Development Director spending 6 total hours at \$49.56/hour and \$19.80/hour in fringe benefits and marketing materials in the amount of \$1,400 to develop a charrette style approach to community involvement. These public meetings will be attended by a translator to ensure that all citizens can understand and participate in the discussion of the proposed clean-up and redevelopment. **Input received will be incorporated into the project plans.**

Task 3- Site-Specific Activities:

The City will utilize the services of a QEP to develop **a final ABCA, Bidding Documents, and a final closeout report for this project.** It is estimated that this will cost \$19,000. All the documents will be available for public comment prior to finalization to ensure public participation. During the remediation, the Environmental Professional will oversee the remediation and document the progress and follow-up with the contractor(s) regarding work that remains to be performed to comply with final cleanup goals. The Environmental Professional will prepare the **Quarterly Reports, ACRES documentation, and all other necessary grant documentation for submission to the EPA.**

Task 4-Oversee Site Cleanup:

The City will **hire an abatement contractor and an environmental contractor to complete the needed remediation work. Asbestos will be abated from the roof. PCBs will be encapsulated** with an approved paint and access will be limited by a new wall. The overall cost of the remediation for asbestos and PCBs is expected to be in excess of \$257,000. The City anticipates contributing \$100,000 toward its cost share for this activity along with \$157,000 from the EPA grant. The City will then seek a **revised VRAP** from the MEDEP so that the redevelopment project will be bankable. The remaining \$343,000 from the EPA grant, along with gap funding from AVCOG and the City, will be used to pressure wash and encapsulated the lead-based paint.

c. Cost Estimates and Outputs

	Project Costs	
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Budget Categories	Task 1: Cooperative Agreement Oversight	Task 2: Public Meeting & Community Involvement	Task 3: Remediation Plan, Bidding, VRAP & Reporting	Task 4: Site Remediation	Total
Personnel	\$1948.96	\$460.16			\$2409.12
Fringe Benefits	\$762.34	\$173			\$935.34
Travel	\$2,000				\$2,000
Equipment					
Supplies		\$1,400			\$1,400
Contractual	\$2,000	\$2,000	\$19,000	\$470,255.54	\$493,255.54
Total Direct Costs	\$6711.30	\$4033.16	\$19,000	\$470,255.54	\$500,000
Indirect Costs					
Total Federal Funding	\$6,711.30	\$4033.16	\$19,000	\$470,255.54	\$500,000
Cost Share 20%				\$100,000	\$100,000
Total Budget	\$6711.30	\$4033.16	\$19,000	\$570,255.54	\$600,000

Administrative costs are equal to Task 1 and 2 Personnel, Fringe, Travel, Supplies, and Contractual to provide oversight of the grant. This totals \$10,744.46, which is 2.15% of the federal grant funds.

Outputs expected as part of the site remediation include:

- Three Community Meetings with Economic Development Director and QEP
- Written documents outlining the cleanup activities, timeline, and future uses in appropriate languages for distribution by community partners.
- Remedial Action Plan, issued by the engineer, including plans and specifications describing remedial activities.
- Site Closure Report, issued by the engineer upon completion of all remediation activities. This report will include a description of activities completed during cleanup of the site.
- Certificate of Completion, issued by the Maine DEP upon their final approval of the Site Closure Report. This certificate documents that the site has been remediated to the satisfaction of the Maine DEP.
- Voluntary Response Action Plan from MEDEP.

d. Measuring Environmental Results

A five-member committee will be formed to oversee the grant. In the initial phase of the grant, a work plan will be submitted detailing the cleanup process. Based on the EPA approved work plan, a matrix will be designed for each task to include the following information: activities expected timeframe, projected results, projected outcomes, and accomplishments. The matrix will be reviewed on a monthly basis, during the committee meeting, to ensure that by the end of the quarter, the grant activities are on task and deliverables are achieved on time. During this time, if it appears that we are not on schedule with an identified task, a written plan will be created to determine the steps needed to get back on track and finish the project within the three-year time frame. This information will then be compiled and submitted to EPA on a quarterly basis. Environmental results will be tracked through the completion of remediation goals including the abatement of asbestos materials, the encapsulation of the PCB-impacted concrete, and the remediation of lead based paint. The City has discussed the encapsulation of the concrete with the MEDEP and it has been deemed an acceptable alternative based on the PCB concentrations in the transformers and capacitors within the facility. The outputs and outcomes as part of this project will be communicated to the EPA as part of our quarterly progress reports and updated property profile in ACRES.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure

The project management team includes Lincoln Jeffers, The Economic and Community Development Director, Grants Accountant Ingrid Nivison, and the Community Development Coordinator, Jayne Jochem, each of whom is a full-time employee at the City of Lewiston. Jeffers has been with the city of Lewiston for almost 20 years and has worked with Brownfields grants for over a decade. He has also worked with several city redevelopment projects. The Grants Accountant, Ingrid Nivison, has ten years of experience in federal grant administration and has administered two Brownfields grants during her time at the City of Lewiston. With over forty years of experience administering federal grants, Jayne Jochem has administered reimbursement requests and many of the reporting requirements for several EPA grants. The City will secure a QEP through its competitive sealed bid process. Staff will work with the City's procurement agent to ensure compliance with EPA requirements. The selected firm will assist the City in selecting an environmental remediation contractor, oversee cleanup activities and coordinate all necessary activities and tasks required by the Maine Department of Environmental Protection and the U.S. EPA.

ii. Acquiring Additional Resources

Procurement will be conducted in accordance with federal and state requirements. The City of Lewiston has a Purchasing Policy which addresses all bids in excess of \$10,000. For projects estimated to cost in excess of \$150,000 to be paid for in whole or in part with Federal Grant funds, an Independent Cost Estimate is prepared prior to going to bid. Notices are displayed in a variety of places including newspapers, email lists, public bulletin boards, and online RFP boards of the Maine Municipal Association. Bids are submitted in an envelope, with openings in public at the time and place stated in public notices. A record of bids is kept by the Finance Director

and all bids are open to public inspection. Formal bids are awarded by a citizen Finance Committee. The procurement process will be used to identify a QEP and all cleanup contractors.

b. Past Performance and Accomplishments

i. Currently or Has Ever Received an EPA Brownfields Grant

(1) Accomplishments

- ✓ The **Bates Mill** Complex received \$425,000 in Brownfields Funding. To date it is 40% redeveloped (400,000 square feet) with 16 new businesses, 1500 employees, \$60 million in private capital invested. The mill is generating \$603,000 annually in new tax revenue. The complex includes Fountain Park, a site for outdoor concert and entertainment events.
- ✓ **Community Wide Assessment Grant** - In 2009, the City received a \$200,000 community-wide assessment grant to assess priority brownfields sites, primarily in the downtown area. The City completed nine Phase I Assessments, three full Phase II Investigations, two targeted Phase II Investigations, and began remediation planning for the Continental Mill and the RI Mitchell site. Development to date on sites investigated include construction of a riverfront 93 room Hampton Inn, 17 pump gas station/convenience store, and the city taking title to the canal system with plans to improve public access and visibility.
- ✓ **Cleanup of Androscoggin Mill # 8** – In 2007 the City received \$200,000 in brownfields cleanup funding, and the City provided a Cost Share of \$40,000 from CDBG funding. Final closeout Report was submitted by Summit Environmental Consultants on October 10, 2011. On 02/10/2012, the site received a VRAP from the State of Maine DEP. The project included cleanup and demolition and was groomed into much needed greenspace in the downtown.

(2) Compliance with Grant Requirements

The City has a long and strong history of compliance with reporting and included EPA and MEDEP staff in regular monthly meetings. The City provided the Project Manager from EPA with completed assessments, reports and annual financial reports, and key measure reports were submitted to U.S. EPA Region 1 as requested. The former Grants Coordinator (Allison Stone) and the QEP administered the Bates Mill Complex cleanup grant. To oversee the Community-Wide Assessment activities, a committee met monthly to track progress and evaluate timeliness of plan. The committee consisted of Lincoln Jeffers, Jayne Jochem, the QEP (John Cressey), the purchasing director (Norm Beauparlant), a representative from MEDEP (Brian Beneski). The same committee was in charge of the Androscoggin Mill #8 cleanup, although the MEDEP representative was Nicholas Hodgkins. Additionally, the regional EPA Brownfields representative, Jim Byrne, was actively involved in the committee work through attending meetings when available or receiving all written materials. The QEP was responsible for documenting ACRES, and Jayne Jochem submitted quarterly timeliness reports and draw downs. For each identified grant, all funds were drawn down, reports submitted, project successfully completed according to the specified work plan, and identified outcomes achieved.